June 11, 2008

Jeanine Townsend, Clerk to the Board State Water Resources Control Board 1001 I Street, 24th Floor Sacramento, CA 95814

DECEIVE

JUN 1 1 2008

the Board trol Board

SWRCB EXECUTIVE

5750 ALMADEN EXPWY SAN JOSE, CA 95118-3686 TELEPHONE (408) 265-2600 FACSIMILE (408) 266-0271 www.voilleywater.org AN EQUAL OPPORTUNITY EMPLOYEE

Public Comment Draft Construction Permit Deadline: 6/11/08 by 12 p.m.

Subject:

Comment Letter- Draft Construction Permit

Dear Ms. Townsend:

The Santa Clara Valley Water District (District) would like to offer its support of the proposed revisions to the Statewide General Construction Permit. The District believes that the changes outlined in the tentative order will support improved water quality in streams, lakes and reservoirs within the state and the District's jurisdiction. We are particularly supportive of the storm water effluent monitoring requirements based on the calculated risk level of a construction site.

With that in mind the District has only two comments for the developers of the tentative order.

The District would appreciate the turbidity monitoring and objectives relative to Table 6 be standardized across the state to use only NTU's as the "Reporting Units". The District is in a unique situation that the northern portion of our jurisdictional area discharges to the San Francisco Bay Regional Water Board area of oversight and the southern portion of our jurisdictional area discharges to the Central Coast Regional Water Board area of oversight. Table 6 indicates turbidity objectives for the Central Coast Regional Water Board to be reported in JTUs which we do not support as all of our equipment and training supports data collection using the NTU method.

Our second comment relates to challenges when using the provided data links when preparing the Receiving Water Worksheets. When attempting to complete "Section A. Watershed Characteristics" the links provided were not functioning in a way that supported completion of the worksheet. The District would recommend that the State Water Board provide a mechanism that ensures or enhances the users accessibility to the data needed to complete the preparation of the various worksheets.

The District would like to thank you for this opportunity to comment on this Tentative Order. If you have any questions please feel free to contact me at 408 265-2607 x2653.

Jeanine Townsend Page 2 June 11, 2008

Sincerely,

J. Brett Calhoun

Senior Water Quality Specialist

Environmental and Regulatory Compliance Unit

cc: B. Goldie, S. Dharasker, D. Drury, File

jbc:lh